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FEB 26 2010

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

CAROLYN D. THOMAS D.D.S.

Plaintiff(s),

LINDQUIST DENTAL CLINIC FOR CHILDREN
V. CAROLYN McDUGAL (LINDQUIST DENTAL CLINIC FOR CHILDREN)
AS WELL AS BELOW

Defendant(s),

CV105123 BHS

EMPLOYMENT DISCRIMINATION COMPLAINT

Name, address and phone number of Plaintiff:

CAROLYN D. THOMAS D.D.S.
15857 NORTHUP WAY
BELLEVUE, WA. 98008

Name and address of Defendant(s): (List additional defendants' names and addresses on a separate sheet of paper.)

CAROLYN McDUGAL (PRESIDENT + CEO LINDQUIST DENTAL CLINIC FOR CHILDREN)
130 131st S
TACOMA, WA 98444

LINDA F. SHARP (OFFICE MANAGER LINDQUIST DENTAL CLINIC FOR CHILDREN)
130 131st S
TACOMA, WA 98444

CAROLE LIGHTELL (PRESIDENT OF BOARD OF LINDQUIST DENTAL CLINIC FOR CHILDREN)
130 131st S
TACOMA, WA 98444

SEA 32742/No Iss

CLINT SANER (VICE-PRESIDENT OF BOARD OF LINDQUIST DENTAL CLINIC FOR CHILDREN)

130 131st S

TACOMA, WA 98444

ABBE SALK (SECRETARY OF BOARD OF LINDQUIST DENTAL CLINIC FOR CHILDREN)

130 131st S

TACOMA, WA 98444

VINCE TILOHA (TREASURER OF BOARD OF LINDQUIST DENTAL CLINIC FOR CHILDREN)

130 131st S

TACOMA, WA 98444

JULIE WURST (BOARD MEMBER, LINDQUIST DENTAL CLINIC FOR CHILDREN)

130 131st S

TACOMA, WA 98444

JIM WHITACRE (BOARD MEMBER, LINDQUIST DENTAL CLINIC FOR CHILDREN)

130 131st S

TACOMA, WA 98444

PETER KRAM (BOARD MEMBER, LINDQUIST DENTAL CLINIC FOR CHILDREN)

130 131st S

TACOMA, WA 98444

This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred on this Court by 42 U.S.C. Section 2000e-5. Equitable and other relief is sought under 42 U.S.C. Section 2000e-5(g).

The acts complained of in this suit concern:

WRONGFUL TERMINATION GENDER DISCRIMINATION DUE PROCESS DENIED
RACIAL DISCRIMINATION AGE DISCRIMINATION RETALIATION

Defendant's conduct is discriminatory with respect to the following:

WRONGFUL TERMINATION, RACIAL DISCRIMINATION, AGE + GENDER + RETALIATION
DUE PROCESS DENIED IN ORDER TO HIRE A WHITE MALE

The basic facts surrounding my claim of discrimination are:

As a BLACK FEMALE I WAS WRONGFULLY TERMINATED, DENIED
DUE PROCESS AND RETALIATED AGAINST FOR EXERCISING MY
FREE RIGHTS SO THAT I COULD BE REPLACED BY A WHITE MALE.
THE WHITE MALE WAS BRIEFLY EMPLOYED AS A "DENTIST"
AT LINDQUIST DENTAL CLINIC FOR CHILDREN BUT RESIGNED LESS
THAN A WEEK IN ORDER TO TAKE A JOB WITH HIGHER PAY
AND BETTER BENEFITS. I WAS TERMINATED APPROX 2 MONTHS
AFTER AND NOW HE HOLDS THE POSITION OF DENTAL DIRECTOR
OF LINDQUIST.

The alleged discrimination occurred on or about:

MAY 2009

I filed charges with the Federal Equal Employment
Opportunity Commission (or Washington State
Human Rights Commission) regarding
defendant's alleged discriminatory conduct on or
about:

JUNE 2009

The Equal Employment Opportunity Commission
issued a Notice of Right to Sue Letter (please
attach copy), which was received by me on or
about:

DEC. 2009

WHEREFORE, plaintiff prays that the Court grant the following relief:

RESTITUTION OF LOST WAGES AND BENEFITS INCLUDING
BUT NOT LIMITED TO MEDICAL, DENTAL, RETIREMENT
DISABILITY, MALPRACTICE AND A PERCENTAGE OF FUTURE
INCOME CAUSED BY BEING WRONGFULLY TERMINATED.

2-24-2010
DATED:

Carolyn D. Thomas, DDS
Signature of Plaintiff

CAROLYN D. THOMAS D.D.S.
Plaintiff's Name

DISMISSAL AND NOTICE OF RIGHTS

To: Carolyn D. Thomas
15857 Northup Way
Bellevue, WA 98008

From: Seattle Field Office
909 First Avenue
Suite 400
Seattle, WA 98104



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

551-2009-01736

Karen McCoskey,
Investigator

(206) 220-6894

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Roderick W. Lucero FOR ALL

Enclosures(s)

A. Luis Lucero, Jr.,
Director

DEC 21 2009

(Date Mailed)

cc: LINDQUIST DENTAL CLINIC FOR CHILDREN
c/o Richard H. Wooster
KRAM, JOHNSON, WOOSTER & McLAUGHLIN, P.S.
1901 South "I" Street
Tacoma, WA 98405